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**DISTRICT COURT
DISTRICT OF NEVADA**

MITCHELL E. HARPER,

Plaintiff.

vs.

NEVADA PROPERTY 1, LLC dba
COSMOPOLITAN OF LAS VEGAS

Defendants.

CASE NO.: 2:19-cv-02069-GMN-VCF

**FILED UNDER SEAL UNDER
COURT ORDER (ECF NO. 38)**

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
PLAINTIFF TO FILE RESPONSE
TO DEFENDANT'S MOTION TO
ENFORCE EARLY NEUTRAL
EVALUATION SETTLEMENT
AGREEMENT AND REQUEST
FOR EVIDENTIARY HEARING**

(FIRST REQUEST)

Plaintiff MITHCELL E. HARPER and Defendant NEVADA PROPERTY 1, LLC, by and through their counsel of record, hereby stipulate and agree to extend the time for Plaintiff to file a response to Defendant's Motion to Enforce Early Neutral Evaluation Settlement Agreement and Request for Evidentiary Hearing. Plaintiff was served on December 14, 2020. Plaintiff's responsive pleading is currently due on December 28, 2020.

1 Plaintiff and Defendant have agreed to an extension of time for Plaintiff to file a
2 response to the Motion to Enforce for the following reasons: undersigned Plaintiff's counsel's,
3 Jenny L. Foley, young son had oral surgery the week before Christmas. Upon review of
4 Defendant's Motion to Enforce, Ms. Foley also needed to consult with HKM Employment
5 Attorneys LLP ethics counsel. According, Ms. Foley requested a one-week extension for
6 Plaintiff to file a response to Defendant's Motion to Enforce, and Defendant's counsel
7 graciously agreed to the extension.

8 Defendant shall, therefore, have a one (1) weeks extension from the current deadline to
9 file a responsive pleading to Defendant's Motion to Enforce, and Plaintiff's responsive pleading
shall be due on January 4, 2021.

10 This stipulation and order is sought in good faith and not for the purpose of
delay. No prior request for any extension of time has neem made.

11 Dated this 29th day of December, 2020.

12 **HKM EMPLOYMENT
ATTORNEYS LLP**

13 /s/ Jenny L. Foley
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20 **ORDER**

21 IT IS SO ORDERED:

22 
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: December 30, 2020